


Approved:   
LINDSEY KEENAN  
Assistant United States Attorney

Before: THE HONORABLE JUDITH C. McCARTHY  
United States Magistrate Judge  
Southern District of New York

20 M 5365

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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of 21 U.S.C.  
846

CHRISTOPHER DENNIS,  
a/k/a "CEEZ,"

:  
COUNTY OF OFFENSE:  
ORANGE

Defendant.

- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS ANDERSON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Conspiracy)

1. From at least in or about March 2019 to on or about March 9, 2020, in the Southern District of New York, CHRISTOPHER DENNIS, a/k/a "CEEZ," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that CHRISTOPHER DENNIS, a/k/a "CEEZ," the defendant, and others known and unknown, would and did possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances involved in the offense were one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. §

841(b)(1)(A).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. My duties and responsibilities include the investigation of narcotics offenses, among other crimes. I base this affidavit on that personal experience, as well as on my conversations with other law enforcement officers, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. I have spoken to an individual ("CS-1") who was arrested in late 2019 in the City of Newburgh on federal narcotics charges.<sup>1</sup> CS-1 has told me, in substance and in part, that from in or about March 2019 through in or about November 2019, he/she purchased approximately 100 grams of heroin per month from CHRISTOPHER DENNIS, a/k/a "CEEZ," the defendant. CS-1 told me that he/she arranged narcotics transactions with DENNIS by contacting a telephone assigned a call number ending in 1921 (the "1921 Phone"), among other phone numbers. CS-1 reviewed a photograph of DENNIS taken from a rap sheet, and identified DENNIS as the individual from whom he/she purchases narcotics.

6. I have reviewed subscriber records provided by AT&T, and I am aware that the 1921 Phone is subscribed to in the name of a female ("CC-1"), who resides at an address on Dubois

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<sup>1</sup> CS-1 has been charged in the Southern District of New York with participating in a conspiracy to distribute narcotics, in violation of 21 U.S.C. § 846. CS-1 is cooperating with law enforcement in the hopes of receiving leniency with respect to federal crimes he participated in. The information CS-1 has provided in connection with this investigation and other investigations has proven reliable, and has at times been independently corroborated by other evidence.

Street, in Newburgh, New York (the "Dubois Street Address").

7. Based on my review of toll records provided by AT&T, I am aware that between in or about March 2019 and in or about November 2019, CS-1 communicated with the 1921 Phone on more than 50 occasions, which corroborates his statements about his purchase of large quantities of narcotics from CHRISTOPHER DENNIS, a/k/a "CEEZ," the defendant.

8. Based on my review of a report from the New York State Police (the "NYSP"), I am aware of the following:

a. On or about March 9, 2020, the NYSP conducted a traffic stop on I-87, in the vicinity of mile marker 44.1, of a black Honda Accord, bearing New York registration ending in 9419 (the "Honda"), due to an obstructed license plate, in violation of New York Vehicle and Traffic Law § 402-1, and a failure to signal, in violation of New York Vehicle and Traffic Law § 1163A.

b. The Honda is registered to CC-1, at the Dubois Street Address.

c. The individual driving the Honda provided a New York State driver's license in the name of CHRISTOPHER DENNIS, the defendant. DENNIS provided the law enforcement officer conducting the traffic stop the call number assigned to the 1921 Phone.

d. CC-1 was in the front passenger seat of the Honda. CC-1 provided the law enforcement officer conducting the traffic stop the Dubois Street Address.

e. According to the law enforcement officer conducting the traffic stop, he conducted a probable cause search of the Honda because it smelled like burnt marijuana. During the search, the law enforcement officer discovered a black plastic bag in the trunk of the Honda. The black plastic bag contained two smaller, clear plastic bags. Each of the clear plastic bags contained a brown, powdery substance.

f. The substance in the plastic bags field-tested positive for the presence of heroin, and weighed approximately 425 grams.

9. I have spoken with another Special Agent (the

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"Special Agent") from the FBI, and I have learned the following:

a. The Special Agent has participated in this investigation, and is familiar with the appearance of CHRISTOPHER DENNIS, a/k/a "CEEZ," the defendant, both as depicted in a photograph from a rap sheet, and from his participation in surveillance in Newburgh, New York.

b. On or about March 9, 2020, the Special Agent observed the Honda on University Avenue in the Bronx, New York. The Special Agent parked nearby the Honda, and within minutes, the Honda drove by with DENNIS in the driver's seat. The Special Agent then followed DENNIS as the Honda traveled on the Cross Bronx Expressway, through New Jersey, to Interstate 87, toward Newburgh, New York.

c. The Special Agent drove past the Honda during the course of the traffic stop conducted by the NYSP, and confirmed again that DENNIS was driving the Honda.

WHEREFORE, deponent respectfully requests that CHRISTOPHER DENNIS, a/k/a "CEEZ" the defendant, be arrested and imprisoned or bailed, as the case may be.

/s/ Thomas Anderson, Credential No. 27249  
SPECIAL AGENT THOMAS ANDERSON  
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me through the  
transmission of this Complaint  
by reliable electronic means, (By Facetime)  
pursuant to Federal Rule of  
Criminal Procedure 4.1 this  
22nd day of May 2020

*Judith C. McCarthy*  
THE HONORABLE JUDITH C. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK